

StarTran

Title VI Service Equity Analysis

Pursuant to FTA Circular 4702.1B

Bus Route restructuring based on 2016 Transit Development Plan

September 2016

StarTran TITLE VI MAJOR SERVICE CHANGE ANALYSIS
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STARTRAN TITLE VI MAJOR SERVICE CHANGE ANALYSIS

1 INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact.

The first step in this analysis is to determine whether service or fare changes meet or exceed the transit providers Major Service Change Policy or Fare Change Policy. If resultant changes have met or exceed these policies then a Service Equity Analysis shall be conducted that describes impacts of service or fare changes on minority and low income populations.

This document is an analysis of StarTran's planned October 2016 bus service changes associated with the recommendations set forth in the 2016 Transit Development Plan.

2 BACKGROUND

StarTran Overview

StarTran is a division of the City of Lincoln that provides fixed-route bus service within city limits. The current bus network can be characterized a hub-and-spoke or radial system, in which all Weekday and Saturday routes radiate from a single point. The primary hub for all regular routes is a two-block on-street transfer point along 11th Street and N Street in downtown Lincoln. StarTran also operates four routes connecting University of Nebraska campuses and a downtown circulator route which operate Weekdays only. Weekday service generally operates 6:00 AM to 7:00 PM. Two of the four routes connecting the campuses operate till 9:00 PM.

Saturday service consists of thirteen routes. Saturday service generally operates 7:00 AM to 6:00 PM. There is no service on Sunday. StarTran provides ADA Complementary Paratransit service, called Handi-Van, within the Lincoln City limits. StarTran's administrative and maintenance facility is located at 710 J Street in Lincoln, NE.

Transit Development Plan Service Changes

The StarTran Transit Development Plan was initiated in February 2015 to improve transit service in Lincoln. The core of the bus route restructuring involved realigning routes, providing more direct service and eliminating those route segments with low ridership. StarTran was careful to ensure adverse effects were off-set or mitigated through improvements/changes to nearby routes, offsetting adverse effects with complementary benefits. The implementation for the route restructure is slated to begin October 2016.

Also included in the Transit Development Plan is a Service Expansion Plan which outlines 5 phases of service improvements for increased frequency on key routes, extended span of service, Sunday service and express bus service. These service improvements require increases in revenue hours and capital investments.

Extensive community engagement was conducted to obtain feedback from riders that included:

1. Meetings with the TDP Advisory Committee
2. Bus Operator interviews
3. April 2015 open houses
4. Build Your Transit System survey
5. September 2015 open houses
6. StarTran Preliminary Service Options online survey.
7. November 19, 2015 StarTran Advisory Board Public Hearing
8. January 19 – 22, 2016 Public Open Houses
9. February 8, 2016 Lincoln City Council Public Hearing

Key themes emerged from the community engagement process:

- Straightening and streamlining routes would improve travel time and system performance.
- A crosstown north-south route would be a good option for riders to eliminate the need to transfer Downtown.
- According to the on-board survey, existing riders rank places served, service frequency, and bus stop amenities lowest in terms of customer satisfaction.
- Later service on weekdays, Sunday service, and more frequent service are desired improvements to the system.
- Express service would be beneficial on several corridors, including O Street.
- Marketing and improved information about routes and arrival times would benefit riders.
- Removing excess service to institutions during off hours (e.g., Southeast Community College service on Saturday) can provide cost savings and potentially allow for reinvestment in increased frequency on more productive routes during peak times.
- Improvements to bus facilities for safety and access during the winter would benefit riders.

Development of Service Scenarios

Three alternative scenarios were created to improve the provision, design, and allocation of transit services. Each scenario was cost-constrained, and the goal of each scenario is increase ridership and transit mode share with a varying focus on maintaining the existing coverage-based system and emphasizing frequency.

Service scenarios were developed based on a number of inputs, including:

- Ridership distribution
- Route design
 - Directness and deviations
 - Street.type (arterial, collector, residential, etc.)
 - Proximity and access to high-density residential areas and ridership generators
- Schedule reliability/On-time performance
- Socio-economic characteristics
 - Areas of high transit demand
- Bus operator feedback
 - Operational issues
 - Customer requests and comments
- On-board survey findings
- Feedback obtained from online surveys and public meetings
- StarTran Advisory Board, TDP Project Advisory Committee, and StarTran staff input

The three scenarios were as follows:

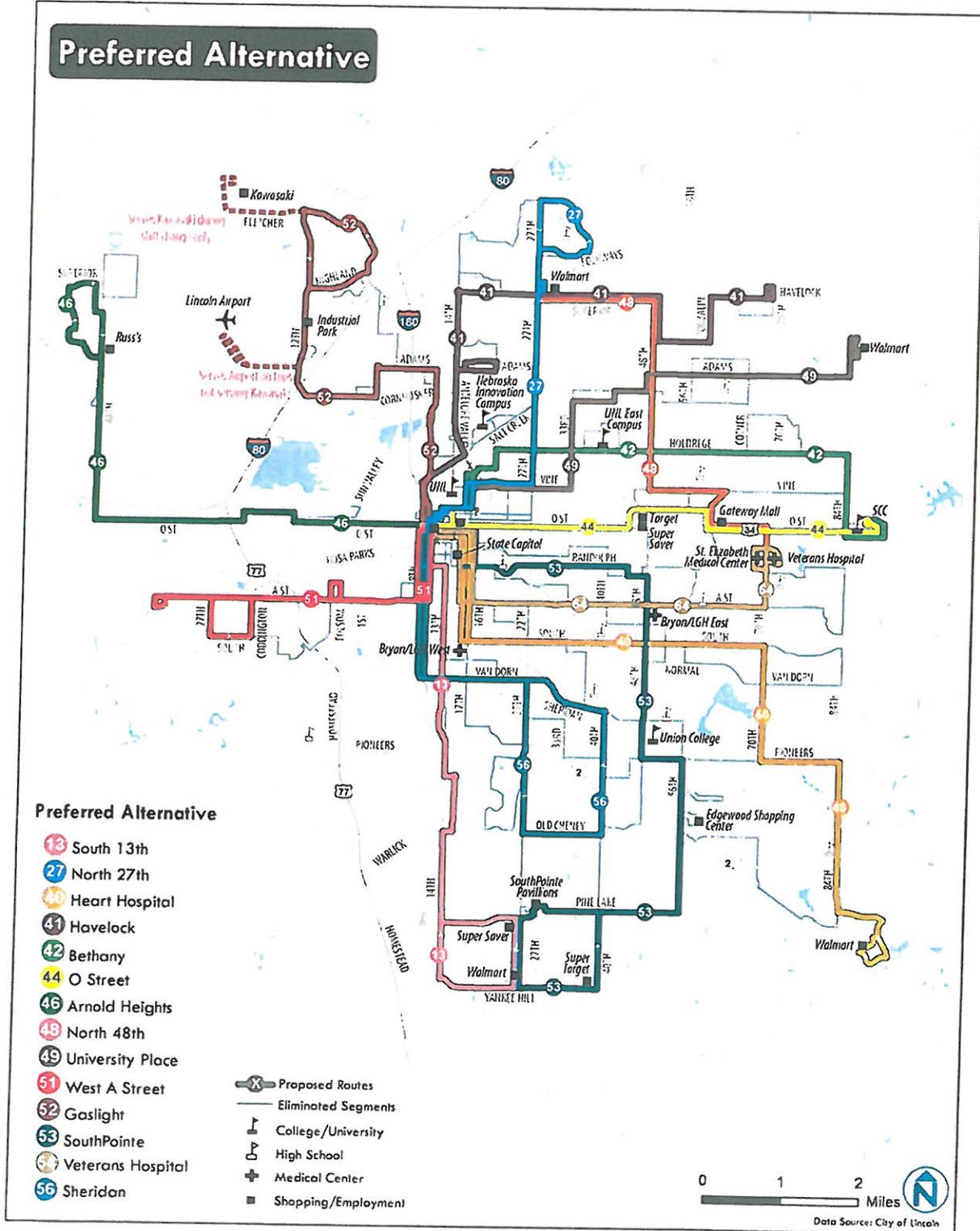
- Scenario 1 – This scenario focused on maintain existing coverage while streamlining and straightening routes where possible.
- Scenario 2 – This scenario included a significant redesign of the StarTran route network and created a north-south crosstown route to the east of downtown. This scenario also extended service span on weekdays and headway improvements on high-ridership routes.
- Scenario 3 – This scenario also included a significant redesign of the StarTran route network. This scenario also included headway improvements on select corridors and extended service span on weekdays and Saturdays.

Service scenarios were uploaded to the StarTran website and presented at two public meetings. A cost constrained preferred alternative was developed in October 2015 based on feedback obtained regarding the three service alternatives.

Benefits of the preferred alternative include:

- Increased Service Span
- Improved Downtown Connections
- More frequent service
- Route Directness
- Crosstown Service
- Service Expansion

Figure 1 TDP Preferred Alternative



Service Expansion

Included in the Mayor's 2016-18 City of Lincoln Budget is Phase 1 of the TDP Service Expansion Plan to include:

- Improve midday headway on Routes 13 and 27 to 30 minutes
- Extend weekday evening service on Routes 13, 27, 41, 44, 46, 53 & 55

The service expansion plan increases service by 6,034 hours.

This Major Change analysis examines the impact of restructured trips and span of service impacts.

3 STARTRAN TITLE VI POLICIES & DEFINITIONS

Title VI regulations were revised to include additional requirements for service policies and evaluating service and fare changes. The requirements including developing written disparate impact policy and disproportionate burden policy to be part of the recipient's Title VI program.

Before conducting any analysis the proposed service or fare change must meet or exceed the recipient's major service or fare change policy.

StarTran currently has policies in place that address this requirement as follows:

3.1 Major Service Change Policy:

A major service change is defined as 25% or greater non-seasoned addition or reduction of vehicle revenue hours, miles or passengers on either a route or systemwide basis. The StarTran Advisory Board may, however, conduct a public hearing on a non-major service reduction change if special circumstances are deemed to exist.

All major service changes will be subject to an equity analysis which includes an analysis of adverse effects on minority and low-income populations.

An adverse effect is defined as a geographical or time-based reduction in service, which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.

3.2 Fare Change Policy:

A major fare change is made when there is a change in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips.

Disparate Impact and Disproportionate Burden Policy

Under the FTA Title VI guidelines, transit providers are required to establish their own thresholds to determine when disparate impacts and disproportionate burdens exist as a result of a major service change or fare change.

3.3 Disparate Impact Policy

“Disparate impact” refers to a facially neutral policy or practices that disproportionately impacts members of a group identified by race, color, or national origin.

The transit provider shall develop a policy for measuring disparate impacts. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations.

The disparate impact threshold must be applied uniformly, regardless of mode, and cannot be altered until the next Title VI Program submission.

StarTran Disparate Impact Policy:

In accordance with Federal Transit Administration (FTA) regulations, should the impact of any major service change require a minority population to bear adverse effects greater than 20% than those adverse effects borne by the non-minority population, that impact will be considered disparate impact.

3.4 Disproportionate Burden Policy

“Disproportionate burden” refers to a neutral policy or practice that disproportionately impacts low-income populations compared to non-low-income populations.

The transit provider shall develop a policy for measuring disproportionate burdens on low-income populations. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly, regardless of mode.

StarTran Disproportionate Burden Policy

In accordance with FTA regulations, should the impact of any major service change require low-income populations to bear adverse effects greater than 20% than those adverse effects borne by the rest of the population, that impact will be considered disproportionate burden.

3.5 Public Review of Title VI Policies

The StarTran Advisory Board reviewed the above policies and approved them at the May 26, 2016. Public input was also held at this meeting. No comments were received from the public in regards to these policies.

3.6 Approval of Title VI Policies

Circular 4702.1B says Title VI policies are to be approved “by the transit provider’s board of directors or appropriate governing entity or official(s) responsible for policy decisions”. The City

of Lincoln Mayor, Chris Beutler, who is responsible for policy decisions for StarTran approved the Title VI policies in an Executive Order on August 29, 2016 (attached).

4 TDP PROPOSED SERVICE CHANGES

The Transit Development Plan included proposed changes in routing and frequency. The recommendations include restructuring or discontinuing some route segments, while also increasing service spans or improving frequencies on other routes. While developing recommendations, care was taken to maintain passengers' access within a reasonable walkshed (quarter mile) of StarTran's service area.

As part of the recommendations resultant from the 2016 Transit Development Plan provided is a summary of the changes to the current route system, both Weekday and Saturday.

**Route
#**

Summary of Change

40	Realigned service along South Street, eliminated segments of E, D, & 33 rd Streets.. Highway 2, 70 th Old Cheney and Pioneers. Frequency changes from 30 minute peak/60 minute off-peak to 60 minute all day service. Impacted customers can use either routes 53, 54 or 56 for portions of route segment reductions. Extend span of service from 7:20 PM to 7:50 PM
41	Realigned service from 27 th Street to 14 th Street, eliminated segment of Logan Street. Extend span of service from 6:45 PM to 9:05 PM.
42	Realigned service along 16 th & 17 th Streets. Eliminated segments of Cotner, Leighton and 76 th Streets. Extended route to SECC. Extend span of service from 6:45 PM to 7:50 PM
43	Eliminated segments of J, K, and L, South, Normal, Van Dorn and 84 th Streets. Portions of these eliminated segments covered by routes 53 & 40.
44	Eliminated segments of 45 th , Vine, 56 th and 84 th Streets. Portions of Vine and 56 th Street covered by new routes. Frequency changes from 30 minute peak/60 minute off-peak to 30 minute all day service. Extend span of service from 7:05 PM to 9:50 PM. Impacted customers can use route 48.
45	Eliminated segments of Lake, 17 th Streets. Eliminated service to Southwood Neighborhood area. Portion of Southwood area served by new Route 56. 17 th Street area served by route 13.
46	Eliminate service to Air Park area. Extend span of service from 7:10 PM to 8:35 PM
47	Eliminated segments of North 14 th , Hilltop, Fletcher and 23 rd Streets.
48	Realigned service along 13 th Street. Extend route to serve Walmart on South 14 th street. Extend span of service from 6:45 PM to 8:00 PM.
49	Realigned service along St. Paul Avenue and Judson Street. Eliminated segment of Huntington Avenue and Cotner Boulevard.
50	Realigned service along 16 th , 17 th , South Street, 48 th Street. Eliminated service on 37 th , La Salle and Briar Park Road. Impacted customers can use routes 53 & 56.
51	Eliminated service to West E and Folsom area, portions of South Street. Eliminated segment of SW 14 th , W. Park Avenue, South and Folsom Street. Frequency changes from 60 minute peak/120 minute off-peak to 60 minute all day service.
52	Realigned service along Highland Boulevard. Eliminated segment of North 1 st , North 3 rd and Fairfield Streets. Extend service to Lincoln airport on select trips. Frequency changes from 60 minute peak/120 minute off-peak to 60 minute all day service
53	Realigned service along Van Dorn and 40 th Street. Eliminated segments of Calvert, 27 th , 33 rd , and Pioneers. Frequency changes from 30 minute peak/60 minute off-peak to 60 minute all day service. Impacted customers can use route 56. Extend span of service from 6:45 PM to 8:45 PM
54	Realigned service along A Street. Eliminated segments of Eastridge Drive, Sandalwood, A, and 84 th Streets.
55	Extend span of service from 6:44 PM to 8:44 PM

No changes were made to the four campus routes, #22, #23, #24 and #25. Also no changes were made to the School Booster routes. As part of the TDP proposed changes the Saturday route network is same as Weekday route network.

5 FINDING OF MAJOR SERVICE CHANGE

5.1 Methodology

To determine whether a Service Equity Analysis is needed StarTran has analyzed how the TDP route changes have met or exceeded the Major Service Change Policy.

As described on page 6 StarTran's Major Service Change Policy is as follows:

A major service change is defined as 25% or greater non-seasoned addition or reduction of vehicle revenue hours, miles or passengers on either a route or systemwide basis. The StarTran Advisory Board may, however, conduct a public hearing on a non-major service reduction change if special circumstances are deemed to exist.

For purposes of this analysis the TDP route changes are described according to:

1. Vehicle Revenue Hours
2. Miles
3. Passengers

5.2 Summary of TDP Service Changes:

Current and Proposed Daily Vehicle Revenue Hours – Total for Weekday & Saturday

Current Weekday Hours	Proposed Weekday Hours	Current Saturday Hours	Proposed Saturday Hours	% Change Weekday	% Change Saturday
340.25	367.25	139.6	154.	7.9%	10.3%

Current and Proposed Daily Vehicle Revenue Miles – Total for Weekday & Saturday

Current Weekday Miles	Proposed Weekday Miles	Current Saturday Miles	Proposed Saturday Miles	% Change Weekday	% Change Saturday
4280	4780	2184	2110	11.6%	-3.5%

Current Passengers impacted by route segment reductions – Total for Weekday & Saturday

Current Weekday Riders	Impacted Riders	Current Saturday Riders	Impacted Riders	% Change Weekday	% Change Saturday
5,779	375	1,891	107	6.5%	5.7%

5.3 Vehicle Revenue Hours for Weekday (Daily)

Current Route	Proposed Route	Current Hours	Proposed Hours	% Change
40	40	32	28.5	-12.2%
41	41	33.5	34.5	+2.9%
42	42	22	26	+18.2%
43	53	22	30	+36.4%
44	44	24	30	+25%
45	56	23	12	-91.6%
46	46	22	23	4.5%
47	27	22	31	+40.9%
48	13	19	32	+68.4%
49	49	22	25.5	+15.9%
50	56	22	12	-83.3%
51	51	10	12	+20%
52	52	12	12	0%
53	53	21	30	+42.8%
54	54	21	14	-50%
55	55	12.75	14.75	15.6%

Based on change in revenue hours current Weekday routes 43, 44, 45, 47, 48, 50, 53 & 54 experience a Major Service Change.

5.4. Vehicle Revenue Hours for Saturday (Daily)

Current Route	Proposed Route	Current Hours	Proposed Hours	% Change
40	40	11	16.5	+50%
41	41	12.6	16.5	+30.9%
42	42	11	13.75	+25%
43	53	11	16.5	+50%
44	44	12	11	-9%
45	56	11	11	0%
46	46	12	11	-9%
47	27	11	11	0%
49	49	12	13.75	+4.6%
50	56	12	11	-9%
51	51	6	6	0%
52	52	6	5	-20%
54	54	12	11	-9%

Based on change in revenue hours current Saturday routes 40, 41, 42, & 43 experience a Major Service Change.

5.5. Vehicle Miles for Weekday (Daily Revenue Miles)

Current Route	Proposed Route	Current Miles	Proposed Miles	% Change
40	40	475	464	-2.3%
41	41	395	444	+12.4%
42	42	245	336	+37.1%
43	53	271	503	+85.6%
44	44	255	359	+40.7%
45	56	247	165	-49.6%
46	46	370	320	-15.6%
47	27	300	254	-18.1%
48	13	286	315	+10.1%
49	49	256	334	+30.4%
50	56	274	165	-66%
51	51	93	128	+37.6%
52	52	155	210	+35.4%
53	53	292	503	+72.2%
54	54	261	175	-49.1%
55	55	105	105	0%

Based on change in daily revenue miles current Weekday routes 42, 43, 44, 45, 49, 50, 51, 52, 53, & 54 experience a Major Service Change.

5.6. Vehicle Miles for Saturday (Daily Revenue Miles)

Current Route	Proposed Route	Current Miles	Proposed Miles	% Change
40	40	252	255	+1.2%
41	41	226	222	-1.8%
42	42	138	176	+27.5%
43	53	145	252	+73.8%
44	44	175	146	-19.8%
45	56	171	140	-22.1%
46	46	248	176	-40.9%
47	27	170	140	-21.4%
49	49	148	175	+18.2%
50	56	150	140	-7.1%
51	51	58	64	+10.3%
52	52	83	87	+4.8%
54	54	220	137	-60.5%

Based on change in daily revenue miles current Saturday routes 42, 43, 46, & 54 experience a Major Service Change.

The next two tables shows the number of current passengers impacted by route segment reductions resulting from TDP route changes using a ¼ mile buffer around the TDP routes.

5.7 Weekday Daily Passengers

Current Route	Total Daily Riders	Impacted Riders	% Change
40	377	8	2%
41	865	0	0%
42	436	26	6%
43	230	9	4%
44	396	44	11%
45	319	38	12%
46	331	13	4%
47	266	35	13%
48	306	0	0%
49	616	38	6%
50	322	43	13%
51	190	13	7%
52	196	16	8%
53	322	21	7%
54	350	54	15%
55	257	0	0%

5.8 Saturday Daily Passengers

Current Route	Total Daily Riders	Impacted Riders	% Change
40	132	0	0%
41	304	0	0%
42	81	4	5%
43	64	5	8%
44	217	16	7%
45	309	38	12%
46	162	0	0%
47	95	6	6%
49	132	11	8%
50	188	11	6%
51	54	0	0%
52	43	3	7%
54	110	13	12%

Based on change in route segment reductions no Weekday or Saturday routes experience a Major Service Change.

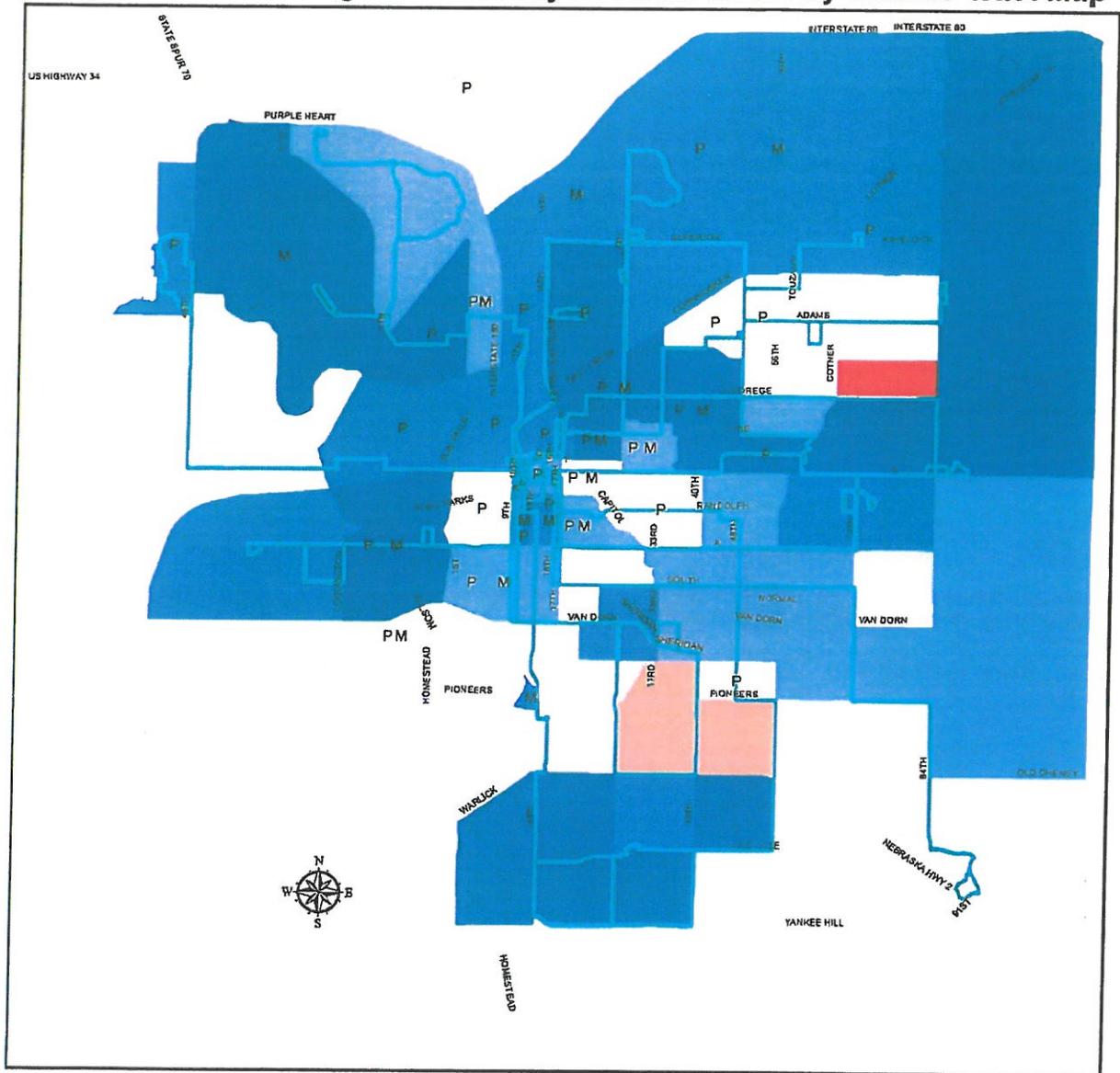
5.9 System-Level Analysis

Because route segments of the current routes were shuffled and recombined into different proposed routes, it is difficult to compare current service to proposed service on a route by route basis. StarTran staff decided to perform additional systemwide analysis in a different format. Staff determined the number of revenue hours and miles by census tract in the current system and compared it to the proposed system. Revenue hours and miles were calculated by splitting routes at the census tract boundaries to form route segments, and attributing the revenue hours and miles of those routes to each segment, as a total proportion of the total route mileage and hours within each census tracts. The number of revenue hours and miles for all segments within each census tract were then totaled, both for the current system and proposed system. This enabled the total values for revenue hours and miles, within each census tract, to be compared.

Census tracts seeing a decrease in service are colored red, and census tracts with increased service are colored blue. This additional analysis is meant to show, in a different format, the impact of service changes by census tract. Figures 1-4 on the next pages illustrate these changes.

Figure 1

City of Lincoln Changes in Weekday Revenue Hours by Census Tract Map



0 0.4 0.8 1.2 1.6 2 2.4 2.8 3.2 3.6 4 Miles

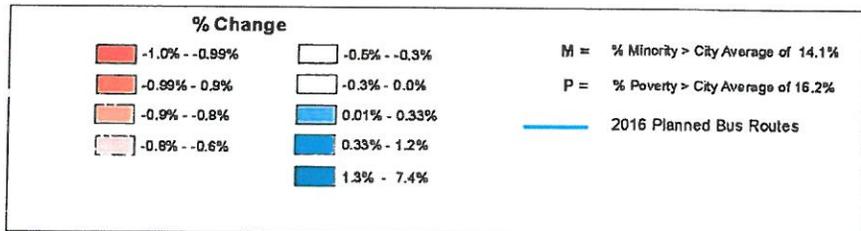
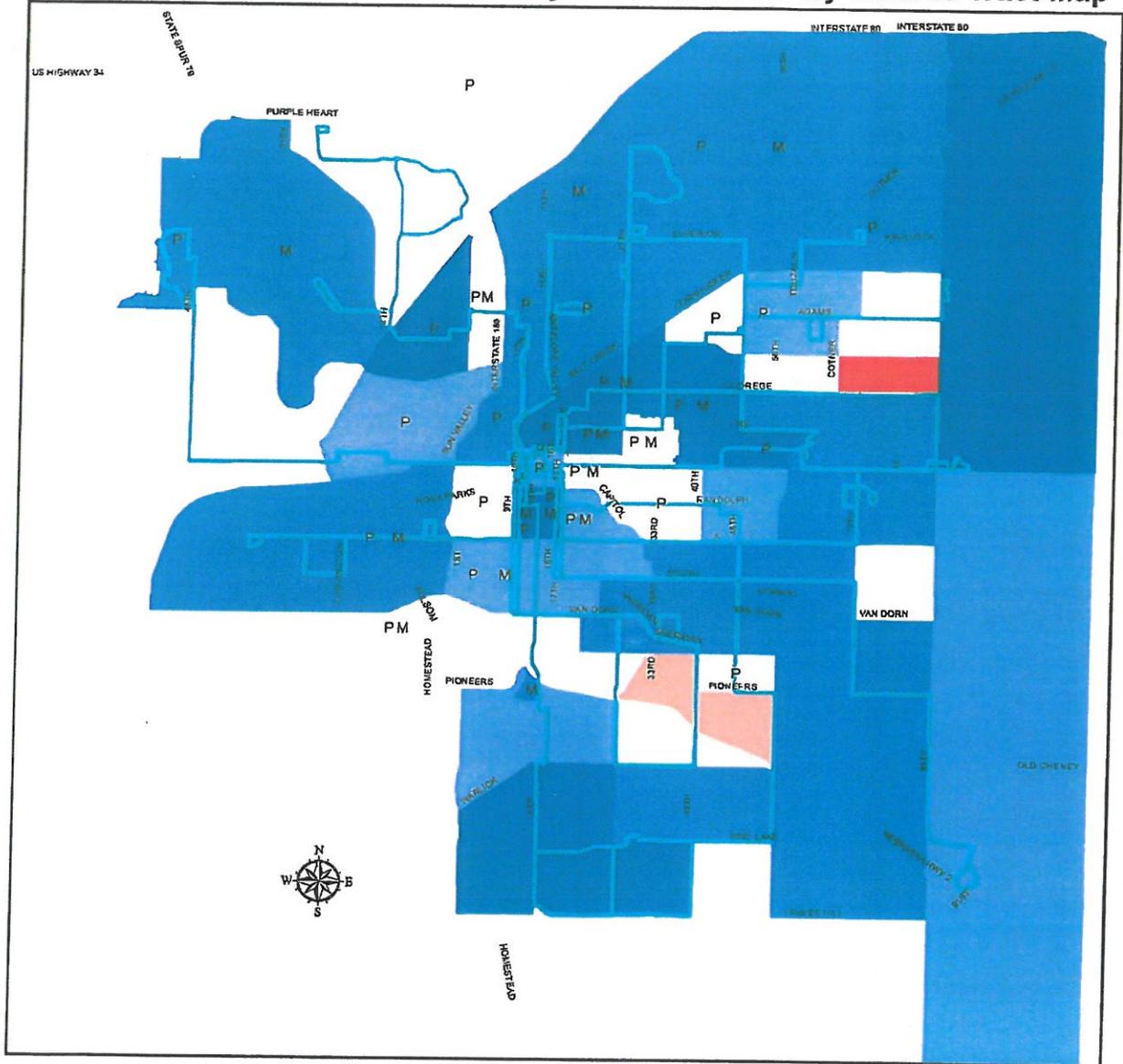


Figure 2

City of Lincoln Changes in Saturday Revenue Hours by Census Tract Map



0 0.4 0.8 1.2 1.6 2 2.4 2.8 3.2 3.6 4 Miles

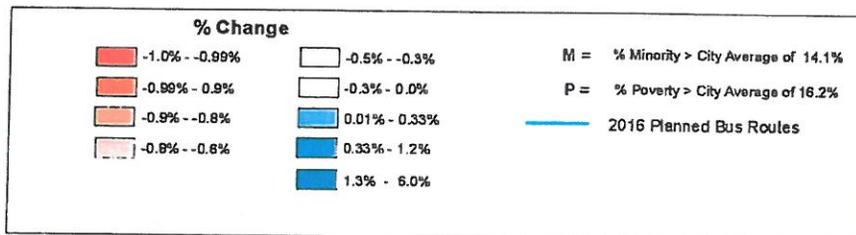
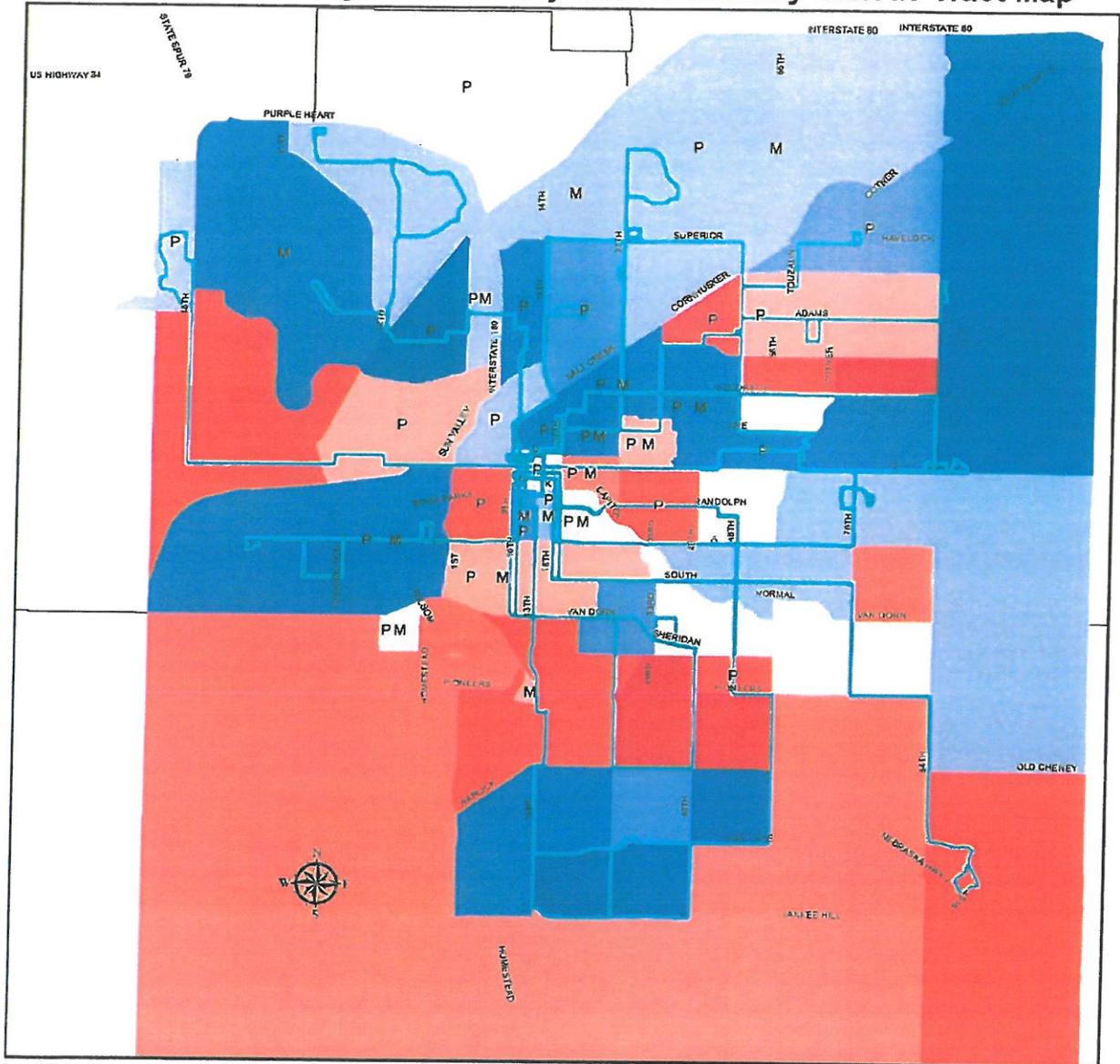


Figure 3

City of Lincoln Changes in Weekday Vehicle Miles by Census Tract Map



0 0.4 0.8 1.2 1.6 2 2.4 2.8 3.2 3.6 4 Miles

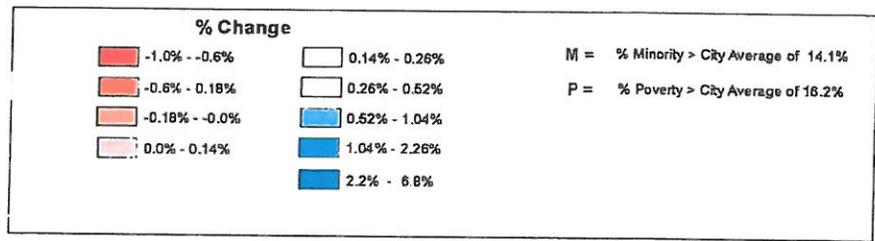
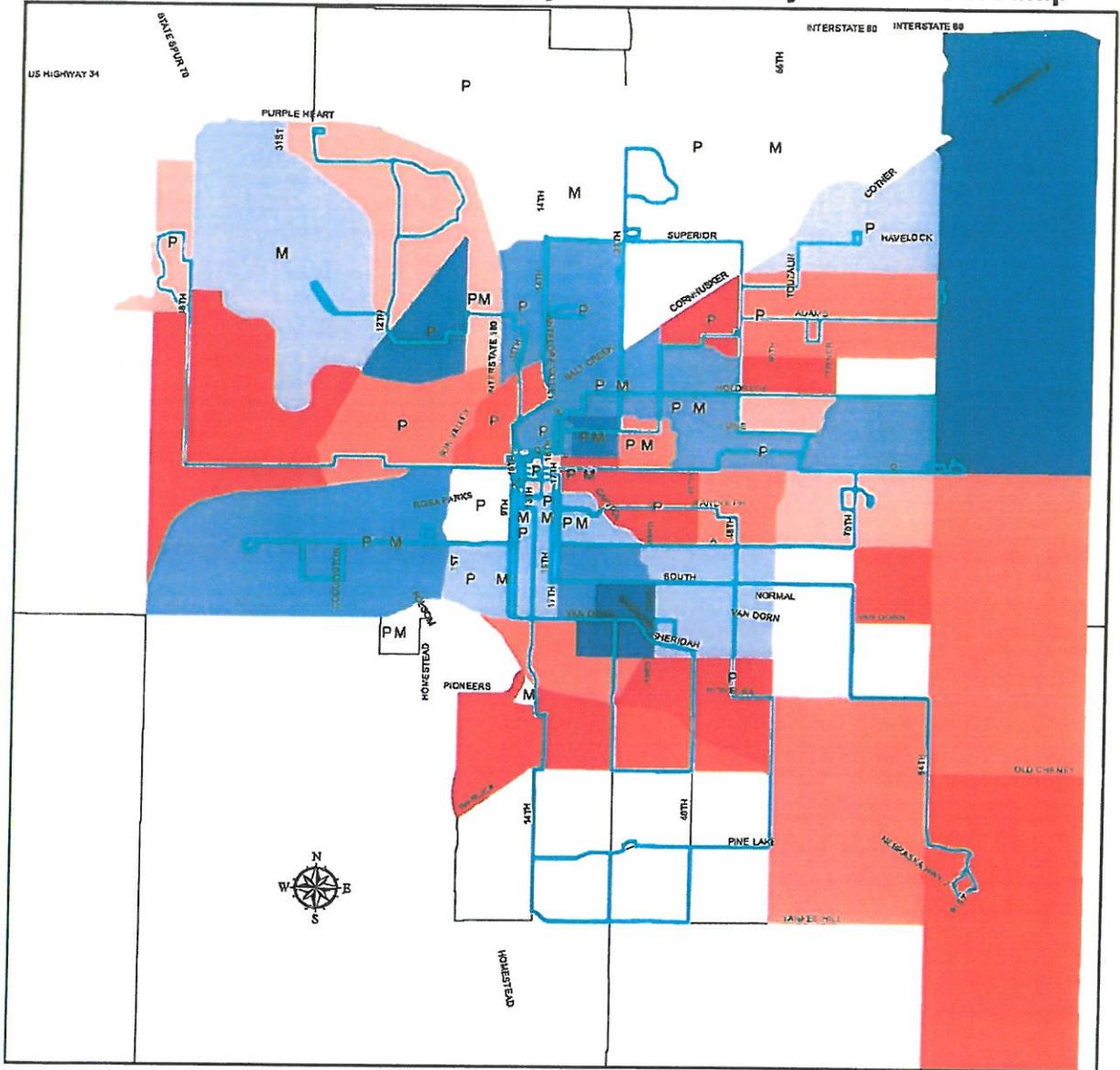


Figure 4

City of Lincoln Changes in Saturday Vehicle Miles by Census Tract Map



0 0.4 0.8 1.2 1.6 2 2.4 2.8 3.2 3.6 4 Miles

% Change		
 -0.75% - -0.33%	 0.19% - 0.3%	M = % Minority > City Average of 14.1%
 -0.33% - 0.15%	 0.3% - 0.7%	P = % Poverty > City Average of 18.2%
 -0.15% - -0.01%	 0.7% - 1.44%	 2016 Planned Bus Routes
 -0.01% - 0.189%	 1.44% - 2.92%	
	 2.9% - 6.13%	



6 EFFECTS OF PROPOSED SERVICE CHANGE ON MINORITY AND LOW INCOME POPULATIONS

Based on the Major Service Change analysis the following routes experience a Major Service Change and therefore subject to a Title VI Equity Analysis.

Weekday Routes	Saturday Routes
42	40
43	41
44	42
45	43
47	46
48	54
49	
50	
51	
52	
53	
54	

6.1 Data Source Process and Selection

StarTran staff identified the minority and low-income population living within ¼ mile of each routes experiencing major service changes, and within the entire service area. GIS mapping and 2010-14 American Community Survey Data were used at the census block level for minority and low income data.

A ¼ mile buffer was placed around each current route to designate the route access range. The population of each tract or block within or touching that buffer was calculated, then the percentages of minority and low-income populations of those tracts/blocks were calculated.

The nature of the service changes proposed as part of the Transit Development Plan led StarTran staff to analyze Census data rather than ridership data. Ridership data was derived from a 2013 on-board survey, however, this data also did not accurately capture income status of bus riders.

6.2 Impact of Service Changes on Minority and Low Income Populations – Weekday Routes

Summary of Service Change	Minority Proportion of the Population			Low-Income Proportion of the Population		
	Census Blocks Along Route	Average Population in Service Area	Difference	Census Block Groups Along Route	Average Population in Service Area	Difference
Route 42 – eliminated route segments, extend span of service hours	18.94%	14.1%	4.84%	14.92%	16.2%	-1.28%
Route 43 - eliminated route segments	13.83%	14.1%	-0.27%	11.20%	16.2%	-5.00%
Route 44 - eliminated route segments, extend span of service hours, increased frequency	15.40%	14.1%	1.30%	14.82%	16.2%	-1.38%
Route 45 - eliminated route segments	17.76%	14.1%	3.66%	15.58%	16.2%	-0.62%
Route 47 - eliminated route segments	17.83%	14.1%	3.73%	18.68%	16.2%	2.48%
Route 48 - eliminated route segments, extend span of service hours	20.52%	14.1%	6.42%	12.30%	16.2%	-3.90%
Route 49 - eliminated route segments	18.94%	14.1%	4.84%	19.62%	16.2%	3.42%
Route 50 - eliminated route segments	16.96%	14.1%	2.86%	13.76%	16.2%	-2.44%
Route 51 - eliminated route segments, Increased frequency	23.34%	14.1%	9.24%	19.96%	16.2%	3.76%
Route 52 - eliminated route segments, Increased frequency	16.66%	14.1%	2.56%	14.70%	16.2%	-1.50%
Route 53 - eliminated route segments, frequency changes	14.24%	14.1%	0.14%	10.59%	16.2%	-5.61%
Route 54 – eliminated route segments	13.71%	14.1%	-0.39%	11.48%	16.2%	-4.72%

6.3 Impact of Service Changes on Minority and Low Income Populations – Saturday Routes

Summary of Service Change	Minority Proportion of the Population			Low-Income Proportion of the Population		
	Census Blocks Along Route	Average Population in Service Area	Difference	Census Block Groups Along Route	Average Population in Service Area	Difference
Route 40 – eliminated route segments	14.33%	14.1%	0.23%	8.91%	16.2%	-7.29%
Route 41 - eliminated route segment	17.64%	14.1%	3.54%	17.94%	16.2%	1.74%
Route 42 - eliminated route segments	18.94%	14.1%	4.84%	14.92%	16.2%	-1.28%
Route 43 - eliminated route segments	13.83%	14.1%	-0.27%	11.20%	16.2%	-5.00%
Route 46 - eliminated route segments	19.26%	14.1%	5.16%	14.89%	16.2%	-1.31%
Route 54 - eliminated route segments	14.72%	14.1%	0.62%	11.99%	16.2%	-4.21%

6.4 Disparate Impact & Disproportionate Burden Impact Findings

StarTran Disparate Impact Policy:

In accordance with Federal Transit Administration (FTA) regulations, should the impact of any major service change require a minority population to bear adverse effects greater than 20% than those adverse effects borne by the non-minority population, that impact will be considered disparate impact.

Analyses of the affected routes shows the difference between the minority population percentage along the routes and the minority population percentage of the service area (City of Lincoln) ranges from -0.39% to 9.24% (Weekday) and -0.27% to 5.16% (Saturday) None of the routes exceed the threshold of 20%, therefore the determination is NO disparate impact.

StarTran Disproportionate Burden Policy

In accordance with FTA regulations, should the impact of any major service change require low-income populations to bear adverse effects greater than 20% than those adverse effects borne by the rest of the population, that impact will be considered disproportionate burden.

Analyses of the affected routes shows the difference between the low income population percentage along the routes and the average low income population percentage of the service area (City of Lincoln) ranges from -5.61% to 3.76% (Weekday) and -7.29% to 1.74% (Saturday). None of the routes exceed the threshold of 20%, therefore the determination is NO disproportionate burden impact.



EXECUTIVE ORDER

Tracking # 16080176

NO. - - 089753

BY VIRTUE OF THE AUTHORITY VESTED IN ME as Mayor of the City of Lincoln, NE, Nebraska:

I hereby approved the attached StarTran Title VI policies that address the requirements of FTA Circular 4702.1B. The Title VI polices are the Disparate Impact Policy and the Disproportionate Burden Policy that are used for conducting service or fare changes. These policies will be used to develop the Title VI Service Equity Analysis based on StarTran route changes.

The City Clerk is hereby directed to return a fully executed document to Brian Praeuner, StarTran, a Division of the City's Public Works Department, for processing.

Dated this 29th day of August 2016

Chris Beutler, Mayor of Lincoln

Approved as to Form and Legality:

[Signature]
Law Department

Approved:

[Signature]
Public Works & Utilities Dept.

MEMO

Date: August 18, 2016

To: Mayor Chris Beutler

From: Brian Praeuner, StarTran

Re: Title VI Polices

Title VI Background:

The grantee (StarTran) must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

FTA requires transit providers (Star Tran) to conduct a Title VI equity analysis for adverse effect whenever they plan a fare change and/or a major service change (proposed definitions below). The Title VI equity analysis is used to determine whether a planned fare change or major service change will have a disparate impact on the basis of race or income.

Since the Title VI analysis is only required when a fare change or major service change is planned, the first step is to determine if the circumstance of a fare change and/or major service change will occur as a result of the planned changes. The Star Tran definitions and thresholds are proposed as follows:

StarTran Major Service Change Policy:

A major service reduction change is defined as 25% or greater non-seasoned addition or reduction of vehicle revenue hours, miles or passengers on either a route or systemwide basis. The StarTran Advisory Board may, however, conduct a public hearing on a non-major service reduction change if special circumstances are deemed to exist. All major service changes will be subject to an equity analysis which includes an analysis of potential adverse effects on minority and low-income populations. An adverse effect is defined as a geographical or time-based reduction in service, which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.

StarTran Fare Change Policy

A fare change is made when there is a change in any cash fare or in the cost of any passes, tickets, transfers, or other means by which transit riders pay for their trips. All fare changes will be subject to an equity analysis which involves an analysis of potential adverse effects on minority and low-income populations.

If planned changes are determined (using the above definitions and thresholds) to result in a fare change or major service change, then a Title VI Equity analysis will be conducted

Need for Star Tran to develop new Title VI Policies

Under Title VI regulations, transit systems over a certain size are required to develop both a written Disparate Impact Policy and a Disproportionate Burden Policy for conducting Title VI equity analysis. **StarTran has now reached the size where we must develop these two policies to conform to FTA regulations.**

The Title VI regulations also require these Title VI policies to be approved "by the transit provider's board of directors or appropriate governing entity or official(s) responsible for policy decisions".

These policies are being done now because:

1. Effective October 1, 2012 Title VI regulations were revised to include additional requirements for service policies and evaluating service and fare changes. The requirements including developing written disparate impact policy and disproportionate burden policy to be part of the recipient's Title VI program. These requirements only applied to those transit providers that operate 50 or more fixed route vehicles in peak service and are located in an area of 200,000 or more population. In October 1, 2012 StarTran operated less than 50 vehicles in peak service therefore these requirements did not apply. Currently, StarTran's vehicle fleet has grown slightly such that we do meet this 50 vehicle peak service threshold.
2. The approved 2016 Transit Development Plan has proposed route changes that meet the threshold for a Major Service Change. It will require StarTran to conduct an analysis to determine whether the planned route changes will have a disparate impact on the basis of race or income. As part of this analysis we are required to use the **Disparate Impact Policy and Disproportionate Burden Policy.**

Explanation of Title VI Policies

1). **What is a Disparate Impact Policy?**

"Disparate impact" refers to a facially neutral policy or practices that disproportionately impacts members of a group identified by race, color, or national origin.

The transit provider shall develop a policy for measuring disparate impacts. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations.

2). **What is a Disproportionate Burden Policy?**

"Disproportionate burden" refers to a neutral policy or practice that disproportionately impacts low-income populations compared to non-low-income populations. Low-income is defined as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.

The transit provider shall develop a policy for measuring disproportionate burdens on low-income populations. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by low-income populations. The

disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly, regardless of mode.

StarTran Proposed Title VI Policies

StarTran proposes the following Title VI policies that will be used for conducting fare or service change analysis:

A. Disparate Impact Policy:

In accordance with Federal Transit Administration (FTA) regulations, should the impact of any major service change require a minority population to bear adverse effects greater than 20% than those adverse effects borne by the non-minority population, that impact will be considered disparate impact.

Process: Census information along the affected routes will be used to determine the percentage that is a minority population. If the percentage that is minority population along an affected route exceeds the minority percentage of the entire service area (City of Lincoln) by 20 percentage points or more, it will be considered an adverse effect.

B. Disproportionate Burden Policy

In accordance with FTA regulations, should the impact of any major service change require low-income populations to bear adverse effects greater than 20% than those adverse effects borne by the rest of the population, that impact will be considered disproportionate burden.

Process: Census information along the affected routes will be used to determine the percentage that is a low-income population. If the percentage that is low-income population along an affected route exceeds the low-income percentage of the entire service area (City of Lincoln) by 20 percentage points or more, it will be considered an adverse effect.

Star Tran Response to a Determination of Disparate Impact or Disproportionate Burden

If StarTran finds a Disparate Impact to minority groups or a Disproportionate Burden Impact to low-income groups, StarTran will follow the Title VI regulations that require transit providers to modify the route or fare change proposal in order to avoid, minimize, or mitigate potential impacts.

Modifications must be made unless the transit provider:

- Has a substantial legitimate justification for the proposed service change; AND
- The transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals.

StarTran Advisory Board Review Process of Title VI Policies

What is the process to review and approve the new policies?

1. On April 8, 2016 StarTran Staff presented the draft Title VI Disparate Impact and Disproportionate Burden policies to the StarTran Operations Committee. That committee approved the policies for presentation to the StarTran Advisory Board. StarTran staff also presented StarTran's Major Service Change Policy and Fare Change Policy to be updated.
2. On April 21, 2016 StarTran staff presented the draft Title VI policies to the StarTran Advisory Board for their review and action. At this meeting the Advisory Board recommended public input be taken on the policies at the May 26, 2016 Advisory Board meeting. Public notification of the meeting included an advertisement in the Lincoln Journal Star newspaper, posting on the StarTran website and email notification to the New Americans Task Force.
3. Public input was taken at the StarTran Advisory Board meeting on May 26, 2016. The StarTran Advisory Board then recommended approval of the policies. Per FTA regulations, that recommendation will be forwarded to "the transit provider's board of directors or appropriate governing entity or official(s) responsible for policy decisions".

Proposed Next Steps:

1. Review and approval of policies by Mayor.
2. StarTran will determine whether the Transit Development Plan recommendations constitute a "Major Service Change" and if so conduct a Title VI Service Equity Analysis using the Disparate Impact Policy and Disproportionate Burden Policy. No fare changes are proposed as part of the TDP, so only the Major Service Change determination is necessary.

NOTE: The TDP will meet the threshold for the proposed Major Service Change policy.

3. Results of Title VI Equity Analysis will be brought before Mayor for his review and approval.
4. City Council and StarTran Advisory Board will be updated on results of Title VI Equity Analysis.

Title VI Process

